

Payments	\$5,676.06	
Attorney fees	\$1,050.00	
MFR cost		
Suspense	\$1,358.98	\$5,367.08

[illegible]

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:

EILEEN F. LENNON

XXX-XX-1787

Debtor.

:CHAPTER 13

:CASE NO. 23-10603-PMM

REO TRUST 2017-RPL1

Movant,

v.

EILEEN F. LENNON

:Hearing Date: September 11, 2024 @ 1:00 p.m.

Debtor,

And

KENNETH E. WEST,

Trustee,

Respondents.

**ORDER OF COURT**

IT IS HEREBY ORDERED that the STIPULATION between Movant, REO Trust 2017-RPL1 and Debtor regarding the resolution of secured creditor's relief motion regarding post-petition mortgage arrearages as to Real Property, known as 1941 Ritter Avenue, Bristol, Pennsylvania 19007 filed on October 11, 2024, in the above matter is APPROVED.

*Patricia M. Mayer*

Honorable Patricia M. Mayer

**Date: October 16, 2024**

**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**STIPULATION RESOLVING MOTION FOR RELIEF FROM THE AUTOMATIC  
STAY TO PERMIT MOVANT TO EXERCISE ITS RIGHTS UNDER STATE LAW  
AGAINST CERTAIN REALTY**

THIS matter being opened to the Court by secured creditor, REO TRUST 2017-RPL1, (hereinafter "Movant"), by and through its counsel Emmanuel J. Argentieri of the law office of Romano Garubo & Argentieri, upon the filing of a motion requesting relief from stay as to real property, more commonly known as 1941 Ritter Avenue, Bristol, Pennsylvania 19007; and it appearing that the parties have amicably resolved their differences and for good cause shown;

1. If any valid proofs of payment are produced by the Debtor, his post-petition mortgage account shall be adjusted accordingly.
2. The Debtor is due \$5,367.08 outside the plan. The amount is computed in the following manner:  
  
3 times payment of \$1,892.02 (07/01/2024 – 09/01/2024)  
  
Less, suspense balance (-\$1,358.98)  
  
Plus, attorney fee reimbursement \$1,050.00
3. The aforesaid arrears (\$5,367.08) shall be rolled into Debtor's Chapter 13 plan as an administrative claim and shall be paid to Movant over the remaining term of Debtor's plan.
4. The Trustee shall adjust his records to reflect the increased amount due to Movant pursuant to this order and pay said increased claim to Movant in normal course.
5. Movant shall file a proof of claim for the above arrearages within (30) days from the entry of this Order.
6. Debtor shall file an amended plan to incorporate the above arrearages within (21) days from the entry of this Order.
7. Commencing with the October 1, 2024 post-petition mortgage payment and continuing each month thereafter for the duration of this Chapter 13 proceeding, Debtor shall remit payments directly to Movant as same come due.
8. The provisions of this stipulation do not constitute a waiver by the Moving Party of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the mortgage and applicable law.
9. If any of the regular monthly mortgage payments commencing after the cure of the post-petition delinquency are more than thirty (30) days late or any payment required herein,

Movant may send Debtor a written notice of default of this Stipulation. If the default is not cured within fifteen (15) days of the date of the notice, counsel for Movant may file a Certification of Default with the Court and the Court shall enter an Order granting it relief from the automatic stay as to the mortgaged property herein.

*The undersigned hereby consent to the form and entry of the within order.*

/S/EMMANUEL J. ARGENTIERI  
Emmanuel J. Argentieri, Esquire  
Attorney for Movant

Date: 9/30/2024

/S/BRAD SADEK  
Brad Sadek, Esquire  
Attorney for Debtor

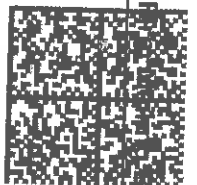
Date: 10/9/2024

/S/JACK K. MILLER  
Jack K. Miller, Esquire  
On behalf of Kenneth E. West  
Chapter 13 Trustee

Date: 10/11/2024

USPS Tracking/Article Number

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345-526/Lennon

KSJ/EJA

## ROMANO GARUBO & ARGENTIERI

*Counselors at Law LLC*

Michael F.J. Romano, Member \*  
[mromano@rgalegal.com](mailto:mromano@rgalegal.com)

Emmanuel J. Argentieri, Member\*  
[eargentieri@rgalegal.com](mailto:eargentieri@rgalegal.com)

Louis W. Skinner\*  
[lskinner@rgalegal.com](mailto:lskinner@rgalegal.com)

\*Member of the NJ & PA Bar  
\*\*Member of the NJ & NY Bar  
\*\*\*Member of NY, NJ, & CA Bar

52 Newton Avenue  
P.O. Box 456  
Woodbury, NJ 08096  
Telephone: (856) 384-1515  
Telefax: (856) 384-6371

*Of Counsel:*  
Angelo G. Garubo, Esquire\*\*  
[agarubo@rgalegal.com](mailto:agarubo@rgalegal.com)

Evan J. Salan, Esquire\*\*\*  
[esalan@rgalegal.com](mailto:esalan@rgalegal.com)

Michael V. Baronio, Esquire\*\*  
[mbaronio@rgalegal.com](mailto:mbaronio@rgalegal.com)

February 19, 2025

*Via: Regular U.S. Mail*  
Michael B. Lennon  
Eileen F. Lennon  
1941 Ritter Avenue  
Bristol, PA 19007

*Via: Regular U.S. Mail*  
Brad J. Sadek  
Sadek & Cooper  
1500 JFK Blvd Suite 220  
Philadelphia, PA 19102

RE: Michael B. Lennon and Eileen F. Lennon  
CHAPTER 13 BANKRUPTCY  
CASE NO. 23-10603-PMM  
Notice of Default

Dear Mrs. Lennon and Mr. Sadek:

As you may be aware, this law firm represents the interests of REO Trust 2017-RPL1 (hereinafter "REO Trust") in the above-captioned matter. As you are further aware, you executed a Note and Mortgage against the above-referenced property.

Undersigned filed a motion for relief from the automatic stay on behalf of REO Trust as to the Ritter Avenue property. As a result of said motion, you agreed to enter into a stipulation settling the motion, which was entered and approved by the Court on October 16, 2024. In said stipulation, you agreed that all post-petition mortgage arrearages were to be cured and all future post-petition payments were to be remitted timely for the remaining life of your Chapter 13 bankruptcy case.

This letter shall serve as formal written notice that you have defaulted under the terms of the aforementioned stipulation. The post-petition account remains due for the January 1, 2025 through February 2025 payments.

REO Trust hereby demands that you bring all past due payments current, in certified funds, within fourteen (14) days from the date of this letter. If you fail to comply in accordance with the terms of this letter, REO Trust will file a certification of default as to the aforesaid Order approving Stipulation Resolving Relief Motion and request that the Court grant REO Trust an order modifying the automatic stay, to permit REO Trust to proceed with its State Law rights as to the aforementioned property.

Please guide yourself accordingly.

Very truly yours,  
Romano Garubo & Argentieri

/S/EMMANUEL J. ARGENTIERI  
Emmanuel J. Argentieri

EJA/ksj

*Enclosures – post-petition payment history & Order/stip*



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*Patricia M. Mayer*

**Date: October 16, 2024**

Honorable Patricia M. Mayer

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Trustee,	:
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4. The Trustee shall adjust his records to reflect the increased amount due to Movant pursuant to this order and pay said increased claim to Movant in normal course.
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*The undersigned hereby consent to the form and entry of the within order.*

/S/EMMANUEL J. ARGENTIERI

Emmanuel J. Argentieri, Esquire  
Attorney for Movant

Date: 9/30/2024

/S/BRAD SADEK

Brad Sadek, Esquire  
Attorney for Debtor

Date: 10/9/2024

/S/JACK K. MILLER

Jack K. Miller, Esquire  
On behalf of Kenneth E. West  
Chapter 13 Trustee

Date: 10/11/2024